

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

RUSSELL F. SHEEHAN, as he is ADMINISTRATOR,  
ELECTRICAL WORKERS' HEALTH AND  
WELFARE FUND, LOCAL 103, I.B.E.W.;  
ELECTRICAL WORKERS' PENSION FUND,  
LOCAL 103, I.B.E.W.; ELECTRICAL WORKERS'  
SUPPLEMENTARY HEALTH AND WELFARE  
FUND, LOCAL 103, I.B.E.W.; ELECTRICAL  
WORKERS' DEFERRED INCOME FUND,  
LOCAL 103, I.B.E.W.; ELECTRICAL WORKERS'  
JOINT APPRENTICESHIP AND TRAINING  
FUND, LOCAL 103, I.B.E.W.; ELECTRICAL  
WORKERS' EDUCATIONAL AND CULTURAL  
FUND; ANTHONY J. SALAMONE, as he is  
ADMINISTRATOR, NATIONAL ELECTRICAL  
BENEFIT FUND; and LOCAL 103, INTERNATIONAL  
BROTHERHOOD OF ELECTRICAL WORKERS,  
Plaintiffs

vs.

FAR EAST ELECTRICAL, INC.,  
Defendant

and

SOVEREIGN BANK,  
Trustee

C.A. No. 05-11634 RGS

**VERIFIED REQUEST TO ENTER DEFAULT**

Plaintiffs Russell F. Sheehan, as he is Administrator, Electrical Workers' Health and Welfare Fund, Local 103, I.B.E.W., et al, request the Clerk to enter the default of Far East Electrical, Inc. ("Far East"). This request is made pursuant to Rule 55(a), Fed.R.Civ.P. In support of this request, the Plaintiffs say:

- 1) This action was filed on August 5, 2005.

- 2) Complaint was served upon Far East on November 29, 2005.
- 3) Far East has never filed an Answer or a responsive pleading to the Complaint.

WHEREFORE, plaintiffs seek the entry of Default in this matter.

Respectfully submitted,

RUSSELL F. SHEEHAN, as he is  
ADMINISTRATOR, ELECTRICAL  
WORKERS' HEALTH AND WELFARE  
FUND, LOCAL 103, I.B.E.W., et al,

By their attorneys,

/s/ Gregory A. Geiman  
Anne R. Sills, Esquire  
BBO #546576  
Gregory A. Geiman, Esquire  
BBO #655207  
Segal, Roitman & Coleman  
11 Beacon Street, Suite #500  
Boston, MA 02108  
(617) 742-0208

Dated: December 22, 2005

### **VERIFICATION**

I, Gregory A. Geiman, verify that I have read this Verified Request to Enter Default and that the facts set out in the Request are true to the best of my knowledge and belief.

/s/ Gregory A. Geiman  
Gregory A. Geiman, Esquire

### **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Plaintiffs' Verified Request to Enter Default has been served by first class mail upon defendant Far East Electrical, Inc. at 10 Haven Lane, Wayland, MA 01778 this 22<sup>nd</sup> day of December, 2005.

/s/ Gregory A. Geiman  
Gregory A. Geiman, Esquire